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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
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11 WELLS FARGO BANK, N.A., AS TRUSTEE  
12 FOR THE POOLING AND SERVICING  
13 AGREEMENT DATED AS OF AUGUST 1,  
14 2005 PARK PLACE SECURITIES, INC.  
ASSET-BACKED PASS-THROUGH  
CERTIFICATES SERIES 2005-WHQ4,

15 Plaintiff,

16 vs.

17 FIDELITY NATIONAL TITLE INSURANCE  
18 COMPANY,

19 Defendant.

Case No.: 3:19-cv-00237-LRH-CSD

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO  
RESPOND TO MOTION TO DISMISS  
[ECF No. 25]**

**[Third Request]**

20 Plaintiff, Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing Agreement  
21 Dated as of August 1, 2005 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates  
22 Series 2005-WHQ4 (“Wells Fargo”) and Defendant Fidelity National Title Insurance Company  
23 (“FNTIC”), by and through their counsel of record, hereby stipulate and agree as follows:

- 24 1. On May 20, 2022, Wells Fargo filed its First Amended Complaint [ECF No. 24];  
25 2. On June 8, 2022, FNTIC filed a Motion to Dismiss [ECF No. 25];  
26 3. Wells Fargo’s deadline to respond to FNTIC’s Motion to Dismiss is July 5, 2022 [ECF  
27 No. 29];

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- 1 4. Wells Fargo's counsel is requesting a third extension until Tuesday, July 19, 2022, to file  
2 its response to the pending Motion to Dismiss;  
3 5. This extension is requested to allow counsel for Wells Fargo additional time to review and  
4 respond to the points and authorities cited to in the pending Motions;  
5 6. Counsel for FNTIC does not oppose the requested extension;  
6 7. This is the third request for an extension which is made in good faith and not for purposes  
7 of delay.

8 **IT IS SO STIPULATED.**

9 DATED this 5<sup>th</sup> day of July, 2022.

DATED this 5<sup>th</sup> day of July, 2022.

10 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

11 /s/ Lindsay D. Dragon

/s/ Kevin S. Sinclair

12 Lindsay D. Dragon, Esq.

Kevin S. Sinclair, Esq.

13 Nevada Bar No. 13474

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15 Las Vegas, NV 89117

Encino, California 91436

16 *Attorneys for Plaintiff, Wells Fargo Bank,*

*Attorney for Defendant, Fidelity National*

17 *N.A., as Trustee for the Pooling and Servicing*

*Title Insurance Company*

18 *Agreement Dated as of August 1, 2005 Park*

19 *Place Securities, Inc. Asset-Backed Pass-*

20 *Through Certificates Series 2005-WHQ4*

21 **IT IS SO ORDERED.**

22 Dated this 6th day of July, 2022.

23   
UNITED STATES DISTRICT JUDGE